

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

THE KYJEN COMPANY, LLC

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS, AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON  
SCHEDULE A,

Defendants.

Case No.: 1:25-cv-21710

**MOTION TO REQUEST VIRTUAL HEARING**

Defendant No. 5, TAIZHOUECHONGSHANGMAOYOUXIANGONGSI (“dechong” or “Defendant”), through its undersigned counsel, respectfully requests that the scheduled hearing on May 27, 2025 be held virtually for the following reasons:

1. We have recently been retained as Defendant’s counsel in this matter.
2. Defendant’s counsel is currently in South Carolina and would have to travel for this hearing.
3. Defendant’s counsel is currently in the process of attempting to facilitate a settlement with Plaintiff’s counsel and we are hopeful that we are going to be able to reach a resolution in this matter.

Plaintiff’s counsel has advised that they do not object to this request.

Respectfully submitted,

Date: May 23, 2025

By: /s/ *Leslie R. Gillis*

Leslie R. Gillis, Esq.

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**CERTIFICATE OF CONFERRAL WITH PLAINTIFF'S COUNSEL**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that I have conferred with plaintiff's counsel prior to filing this motion. Plaintiff's counsel has advised that they have no objections to this request. We only represent Defendant No. 5 in this case, dechong.

/s/ Leslie Gillis  
Leslie Gillis